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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before The
Federal Communications Commission
Washington, D.C. 205542

In the Matter of)
)
The Use of N11 Codes and Other) CC Docket No. 92-105
Abbreviated Dialing Arrangements)

COMMENTS OF THE SOUTHERN NEW ENGLAND TELEPHONE COMPANY

I. INTRODUCTION

The Southern New England Telephone Company (SNET) hereby submits its Comments in response to the Federal Communications Commission's (Commission) Notice of Proposed Rulemaking (NPRM) regarding The Use Of N11 Codes and Other abbreviated dialing arrangements.¹ In this NPRM the Commission is inviting comments on proposed changes to its

1 CC Docket No. 92-105, The Use of N11 Codes and Other Abbreviated Dialing Arrangements, Adopted May 4, 1992, Released May 6, 1992 ("NPRM").

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rules that would require Local Exchange Carriers (LECS) to provide abbreviated dialing arrangements, in particular through the use of N11 service codes.²

II. N11 CODES SHOULD REMAIN WITH THE LOCAL EXCHANGE CARRIERS

Historically N11 service codes have resided with the LECs and have been used for a great variety of internal and external purposes, all related to the provision of service to customers. The most widely recognized of such codes, as noted by the NPRM, are 411 for directory assistance and 911 for emergency calls. Following closely behind are 611 for repair and 811 for business office related purposes.³ These service codes have nationwide customer recognition for their traditional uses. All these uses are clearly in the public interest, and, SNET urges, should not be disrupted.

With respect to other N11 service codes, many uses exist that are no less important because they are less

2 NPRM at p. 1.

3 SNET currently uses 411, 911 and 611 for these purposes, has used 811 for internal purposes, and is currently contemplating use of 811 for business office related purposes. In addition, 711 is in regular use for certain network interconnection purposes.

visible. Such uses involve, as examples, testing and network interconnection, and, as LEC networks evolve and gain in sophistication, they can be expected to continue to serve useful internal network management purposes. Again SNET submits that such use is in the public interest, and should continue.

Moreover no public policy objective would be served by disrupting the existing arrangement, and SNET urges the Commission most strongly not to do so. It is not as though multiple network access dialing arrangements do not exist today. These include, for example, seven digit access via 976 numbers and ten digit access via 900 numbers.

There is simply no pressing need or interest to be served by turning the very limited number of potentially available N11 service codes into abbreviated dialing vehicles for enhanced services providers. Indeed, SNET would argue that such action might well do more harm than good, even in terms of competition in the enhanced services market.

This very limited number of service codes would mean that a few enhanced services providers would gain some artificial advantage over their competitors, thus potentially

dampening competition.⁴ Moreover, the provision of codes subject to revocation, as would be necessary given the critical shortages in the current numbering plan, again could cause more harm than good in the form of customer disruption and confusion in the event that any revocation were ultimately required.

For these reasons, SNET urges that LECs retain the N11 service codes for their traditional service purposes, for internal network management purposes, and for possible new service arrangements as well, as discussed in Section IV infra.

III. AT A MINIMUM 411, 611, 811 AND 911 SHOULD REMAIN WITH THE LECS.

As noted in Section II supra, the 411, 611, 811 and 911 service codes have nationwide customer recognition for their specified purposes, and are fundamentally intertwined with the LECs' management of their businesses and their networks. Taking them away at this point would cause significant and unnecessary customer confusion and LEC disruption. Were we designing a numbering plan from a blank

4 Such perceived advantage could also lead to trafficking in N11 codes, a result that would clearly not be in the public interest.

slate, another alternative might well be the outcome. But given where we are today, SNET submits that, even if the Commission were to determine that some N11 service codes should be made available to others, it is essential that these four remain with the LECs for their traditional purposes.

IV. ASSIGNMENT PROVISIONS AND APPLICABLE TERMS SHOULD BE CLEAR

If the Commission were to decide to proceed with allocation of some N11 codes to third parties at this time, SNET urges that all applicable terms and conditions be as clear as possible to minimize uncertainty and adverse customer effects, and to avoid unnecessary costs. In particular the allocation procedure, and any revocation procedure, must be absolutely clear so that all parties understand their rights at the outset. In this regard SNET questions the merit of either a lottery or a first come first serve test for determining assignment. Neither seems an appropriate means for allocating this admittedly scarce resource.

V. LEC PROVIDED N11 DIALING PLATFORMS ARE IN THE LONG TERM PUBLIC INTEREST

Were the Commission to determine that N11 codes should provide some part of long term dialing access arrangements for enhanced service providers, SNET submits that the preferred approach would be to allow the LECs to provide

such dialing platforms. Such arrangements would ensure that all enhanced services providers had abbreviated dialing arrangements on a fair and equal basis, and so could help foster competition in this area. Indeed, without such a locally provided platform, it may very well prove difficult for the smaller enhanced service providers to obtain dialing access arrangements as favorable as those available to the larger providers.

Obviously such dialing platforms could not be immediately implemented on a ubiquitous basis, but could well be phased in consistent with other changes in network architecture that lie ahead. In particular SNET submits that a LEC provided N11 platform would complement the Commission's advanced intelligent network objectives, and support the long term public interest. In all cases, SNET would urge the development of national standards applicable to any abbreviated dialing plan that may ultimately be developed.

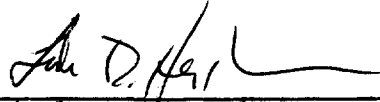
V. CONCLUSION

For the reasons set forth herein, SNET urges that it is in the public interest that LECs retain the N11 service codes. In any event SNET urges the retention by LECs of the four N11 codes historically used for provisioning and service purposes.

Respectfully submitted,

The Southern New England
Telephone Company

By:

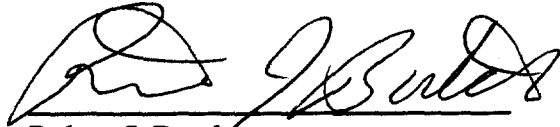


Linda D. Hershman
Vice President-External Affairs
227 Church St., 14th Floor
New Haven, Connecticut 06510
Telephone (203) 771-2216

June 5, 1992

CERTIFICATE OF SERVICE

I, Robert J. Butch, hereby certify that I have on this 5th day of June, 1992 served the foregoing Southern New England Telephone Company Comments In the Matter of the Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket 92-105.



Robert J. Butch

Alfred Sikes, Chairman*
Federal Communication Commission
1919 M St., NW-Room 814
Washington, D.C. 20554

Ervin S. Duggan, Commissioner*
Federal Communication Commission
1919 M St., NW-Room 832
Washington, D.C. 20554

James H. Quello, Commissioner*
Federal Communication Commission
1919 M St., NW-Room 802
Washington, D.C. 20554

Andrew C. Barrett, Commissioner*
Federal Communication Commission
1919 M St., NW-Room 844
Washington, D.C. 20554

Sherrie P. Marshall, Commissioner*
Federal Communication Commission
1919 M St., NW-Room 826
Washington, D.C. 20554

Peyton Wynns*
Federal Communication Commission
1919 M St., NW-Room 538
Washington, D.C. 20554

Downtown Copy Center*
1919 M St., NW-Room 246
Washington, D.C. 20554

Secretary*
1919 M St., NW
Washington, D.C. 20554

*Hand Delivered
June 5, 1992